

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a)
SHAREHOLDER.COM,)

Plaintiff,)

v.)

Civil Action No. 04-10535-PBS

CCBN.COM, INC., THE THOMSON)
CORPORATION, ROBERT I. ADLER,)
JOHN DOES 1 THROUGH 5,)
AND JANE DOES 1 THROUGH 5,)

Defendants.)

**DEFENDANT ADLER'S MOTION FOR
AN EXTENSION OF THE DISCOVERY DEADLINE**

Defendant Robert Adler ("Adler"), with the assent of co-Defendants CCBN.com, Inc. ("CCBN") and The Thomson Corporation ("Thomson"), hereby moves for an extension of the discovery deadlines in this case. As set forth more fully in a supporting memorandum, Adler was not joined as a party to this litigation until April 12, 2005, and did not file the Answer to the Amended Complaint until April 29, 2005; it is not reasonable to expect him to be able to complete fact discovery by the current deadline of June 1.

WHEREFORE, Adler respectfully requests that this Court extend the fact discovery deadline until October 1, 2005, and amend the remainder of the case schedule as follows: submission of expert reports would be due on November 1, 2005; rebuttal expert reports would be due on December 15, 2005; the expert discovery deadline would be January 30, 2006; summary judgment motions would be due by February 28, 2006; oppositions would be due by March 21, 2006; and a hearing on summary judgment or a pretrial conference would be set for some time in April 2006.

LOCAL RULE 7.1(a)(2) CERTIFICATION

The undersigned hereby certifies, pursuant to Local Rule 7.1(a)(2), that counsel for Adler has communicated with counsel for the other parties and attempted in good faith to resolve the issues presented in this motion. While counsel for CCBN and Thomson has assented to extending the fact discovery deadline until October 1, counsel for Shareholder has indicated that at this time, it would assent only to a one-month extension with no further extensions possible.

ROBERT ADLER,
By his attorneys,

/s/ Richard J. McCarthy
Richard J. McCarthy (BBO #328600)
Mark B. Dubnoff (BBO # 637212)
EDWARDS & ANGELL, LLP
101 Federal Street
Boston, MA 02110
Tel. (617) 439-4444
Fax (617) 439-4170

May 13, 2005